

REMARKS

After entry of the above amendments claims 24-47 will be pending in the above-identified application. Applicants reserve the right to pursue any cancelled claim in a continuation application. New claims 24-47 correspond to some of the cancelled original claims 1-23 and are supported in the detailed specification, for instance, on page 8, lines 11-22, page 9, lines 9-16, page 10, lines 8-22, and pages 12-15. No new matter has been added.

In the final Office action dated August 9, 2005, now cancelled claims 1-2, 4-10, and 12-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Meyerzon et al., U.S. Patent No. 6,631,369 (hereinafter "Meyerzon"), in view of Nelson et al., U.S. Patent No. 6,243,713 (hereinafter "Nelson"), and further in view of Matsubayashi et al., U.S. Patent No. 6,473,754 (hereinafter "Matsubayashi").

Meyerzon, Nelson, and Matsubayashi do not, alone or in combination, disclose, teach, or suggest "generating a virtual document based on the retrieved document, the virtual document comprising a portion of the retrieved document that characterizes an overall content of the retrieved document and being used to index the retrieved document," as recited in Claims 24, 32, and 40

New claims 24, 32, and 40 recite "generating a virtual document based on the retrieved document, the virtual document comprising a portion of the retrieved document that characterizes an overall content of the retrieved document and being used to index the retrieved document." The Office action states:

Meyerzon discloses . . . generating a document extract corresponding to the document (see col. 4, lines 53-67, Meyerzon) . . . Meyerzon, however, does not explicitly disclose extracting a portion of the document that characterizes the document's subject content to form the document extract and decomposing the document extract. Nelson, on the other hand, discloses the retrieval system for

retrieval of multimedia information including the extracting a portion of the document and decomposing the document into a plurality of tokens (see abstract of Nelson; col. 5, line 52-col. 6, line 65; col. 7, lines 46-67 and col. 9, lines 60-65).

(August 9, 2005 final Office action, pg. 3).

Meyerzon is directed to "a method and system for identifying documents in a document store that have changed, are new, or have been deleted." (Col. 3, ll. 4-6). The passage of Meyerzon cited in the final Office action states:

Each document listed in the transaction log is retrieved from its Web site and processed. The processing may include extracting the data from each of these retrieved documents and storing that data in an index, or other database

(Col. 4, ll. 53-57). Thus, Meyerzon, merely discloses a conventional solution that indexes documents based on the whole document, which requires much more storage than necessary. In contrast, claims 24, 32, 40 recites "generating a virtual document based on the retrieved document, the virtual document comprising a portion of the retrieved document that characterizes an overall content of the retrieved document and being used to index the retrieved document." (emphasis added).

Additionally, Meyerzon states that "the indexing and search engines 300 are not required by the present invention." (Col. 8, ll. 18-19). Hence, Meyerzon is not even directed to the problems solved by the present invention.

Nelson does not cure the deficiencies of Meyerzon. Nelson is directed to "[indexing] compound documents . . . [that include] multimedia components such as text, images, audio, or

video components, into a unified common index" (Col. 2, ll. 22-24). The passage of Nelson cited in the final Office action states:

Compound documents are separated 110 into constituent multimedia components of different data types, such as text, images, video, audio/voice, and other data types. Each multimedia component is then processed with type-specific pre-processing 120 to prepare it for indexing. . . . The pre-processing decomposes the compound document 100 into its multimedia components, and creates indexable data for each of these multimedia components. The indexed data for all of the types of multimedia components is then stored 130 in the multimedia index 140.

(Col. 5, ll. 52-67). Therefore, although each compound document in Nelson is broken down into the different multimedia components contained therein, every single multimedia component of each compound document is indexed. In other words, the indexing of each compound document is based on the whole compound document, not just a portion of the compound document as asserted in the final Office action. Consequently, Nelson fails to teach "generating a virtual document based on the retrieved document, the virtual document comprising a portion of the retrieved document that characterizes an overall content of the retrieved document and being used to index the retrieved document," as recited in claims 24, 32, and 40 (emphasis added).

Furthermore, each multimedia component of a compound document cannot be construed as "a portion of the . . . document that characterizes an overall content of the . . . document," as recited in claims 24, 32, and 40. Specifically, an image in a compound document may have nothing to do with the subject matter of the document. Hence, Nelson does not disclose "generating a virtual document based on the retrieved document, the virtual document comprising a portion of the retrieved document that characterizes an overall content of the

retrieved document and being used to index the retrieved document," as recited in claims 24, 32, and 40 (emphasis added).

Thus, even if Meyerzon was combined with Nelson, the combination would neither teach nor suggest "generating a virtual document based on the retrieved document, the virtual document comprising a portion of the retrieved document that characterizes an overall content of the retrieved document and being used to index the retrieved document," as recited in claims 24, 32, and 40.

Matsubayashi, like Nelson, fails to cure the deficiencies of Meyerzon. Matsubayashi is directed to a "searching technique [using] . . . an example document (which will be referred to as a 'seed' document, hereinafter) containing contents desired by a user per se to search for a document or documents similar to the seed document." (Col. 1, ll. 48-51). This searching technique is complicated by the fact that Japanese uses two types of characters, Kanji and Katakana. *See, e.g.*, col. 2, ll. 37-46. Hence, prior art methods of this searching technique usually employed a dictionary when extracting character strings from the seed document. *See, e.g.*, col. 2, ll. 6-35. Matsubayashi discloses "[a] method for extracting features in contents of a document without using a word dictionary . . ." (Abstract). Consequently, there is no discussion in Matsubayashi about indexing of documents for subsequent use by search engines to satisfy search queries.

Therefore, even if Meyerzon was combined with Nelson and Matsubayashi, the combination would neither teach nor suggest "generating a virtual document based on the retrieved document, the virtual document comprising a portion of the retrieved document that

characterizes an overall content of the retrieved document and being used to index the retrieved document," as recited in claims 24, 32, and 40.

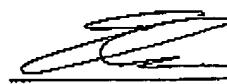
Accordingly, based at least on the above reasons, applicants respectfully submit that claims 24, 32, and 40 are patentable over Meyerzon, in view of Nelson, and further in view of Matsabayashi. Given that claims 25-31, 33-39, and 41-47 depend from claims 24, 32, and 40 it is respectfully submitted that those claims are patentable over Meyerzon, in view of Nelson, and further in view of Matsabayashi for at least the same reasons.

CONCLUSION

On the basis of the above remarks, reconsideration and allowance of the claims is believed to be warranted and such action is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

Respectfully submitted,
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Dated: December 6, 2005


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